

# Robinson + Cole

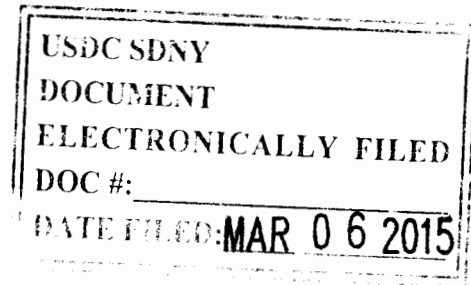
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March 5, 2015

Via CM/ECF

Hon. Katherine B. Forrest  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1950  
New York, NY 10007



Re: **Cross Country Construction, LLC v. Hanover Insurance Company**  
Case Number: 7:14-cv-09952-KBF - Letter Motion to Adjourn Initial Conference

Dear Judge Forrest:

The parties received notification that you have rescheduled the initial conference in this case for April 1, 2015. (Document No. 17). However, on February 17, 2015, Judge Siebel adjourned the initial conference to June 26, 2015 (Document No. 16). With the concurrence of counsel for the plaintiffs, I am writing to request an adjournment of the conference to an available date no earlier than June 1, 2015.

This case involves whether loss to a crane damaged in a construction accident is covered under the defendant's insurance policy. The determination depends in large part on the conclusions of engineering experts. Counsel for the parties have agreed, following exchange of Fed R Ci. P. 26(a) mandatory disclosures, to exchange their respective engineers' complete files and schedule a meeting of the opposing engineering experts, in the hopes of reaching agreement on key factual issues. The parties will participate in an initial conference with the Court on April 1, 2015 if the Court wishes. A later conference, however, would enable the parties to schedule this multi-party meeting, and report the status of negotiations to the Court at the initial conference, along with preparing a proposed scheduling order.

# Robinson + Cole

Hon. Katherine B. Forrest  
March 5, 2015  
Page 2

Accordingly, the parties join in requesting the Court to adjourn the initial conference until a date no earlier than June 1, 2015.

Respectfully yours,

/s/ Raymond T. DeMeo

Raymond T. DeMeo  
Counsel for Hanover Insurance Company

RTD/drd

Copy to: All Counsel of Record (via CM/ECF)

ordered  
Let's proceed with  
the conference but  
it will be telephonic.

3/5/15  
K. R. Z.  
USDJ